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**BY FAX and REGULAR MAIL**

August 5, 2003

Liane M. Randolph, Chair  
Fair Political Practices Commission  
428 J Street, Suite 800  
Sacramento, CA 95814Re: October 7 Recall election; compliance by replacement candidates

Dear Chair Randolph:

Our office represents Issa for Governor, 2003. My client joins you and your agency in viewing campaign finance reform and the integrity of the electoral process very seriously. We are therefore writing to express our sincere concern that the FPPC not step-back from its responsibility to vigorously and even-handedly enforce the campaign finance laws in this election to all candidates, including those who may appear "frivolous" in media reports. All the properly filed candidates, including those who are apparently not serious about the election but who as candidates are attempting to exploit media attention in the election for personal gain, should be held to the same stringent enforcement standards under the law, with no exceptions.

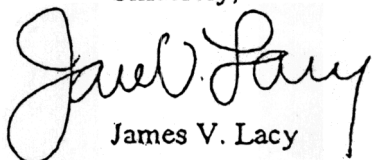
Published reports suggest as many as 300 candidates will be filing to run as replacement candidates for Governor. We are therefore also concerned that some of these candidates may have little idea of the filing requirements, such as FPPC Form 501 "Candidate Intention Statement," FPPC Form 410 "Statement of Organization," the periodic disclosure required on FPPC Form 460, as well reporting of late contributions on FPPC Form 497. Some of these candidates may not even be aware that under the new law, Proposition 34 requires them to set-up electronic internet filing links with the Secretary of State and disclose each and every contribution of \$1,000 or more electronically within 24 hours of receipt. Given the increased penalties enacted in Proposition 34, we are concerned that with so many candidates, including some whose intentions are not to be taken seriously but rather to exploit media attention, there may be widespread violations of the campaign finance law. We are concerned that your agency will be swamped with enforcement actions during and after the election.

We therefore encourage your agency to be proactive, and offer outreach to inform these potential candidates in advance of the many compliance requirements, especially

the changes under Proposition 34, and the seriousness of the financial penalties that are involved with a violation of the law. We hope that by taking proactive steps in the media to explain these major compliance issues, that you will help improve actual compliance during the election, and help set the tone for a fair election.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script, reading "James V. Lacy". The signature is written in black ink and is positioned above the printed name.

James V. Lacy